

ROBBINS GELLER RUDMAN  
& DOWD LLP  
CHRISTOPHER P. SEEFER (201197)  
Post Montgomery Center  
One Montgomery Street, Suite 1800  
San Francisco, CA 94104  
Telephone: 415/288-4545  
415/288-4534 (fax)  
cseef@rgrdlaw.com

[Proposed] Lead Counsel for Plaintiff

[Additional counsel appear on signature page.]

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

VINCE BONATO, Individually and on Behalf ) No. 11-cv-02732-CRB  
of All Others Similarly Situated, )

Plaintiff, )

vs. )

YAHOO! INC., et al., )

Defendants. )

CLASS ACTION

STIPULATION AND ~~PROPOSED~~ ORDER  
CONSOLIDATING RELATED ACTIONS

WHEREAS, on August 18, 2011, the Court entered an Order relating two securities class actions pending in this District pursuant to N.D. Cal. Civil. L.R. 3-12(a): *Bonato v. Yahoo! Inc.*, No. 11-cv-02732-CRB (filed on June 6, 2011) and *Twin City Pipe Trades Pension Trust v. Yahoo! Inc.*, No. 11-cv-03870-CRB (filed on August 5, 2011) (collectively, the “Related Actions”);

WHEREAS, the Private Securities Litigation Reform Act of 1995 requires district courts to address consolidation before appointing a lead plaintiff (*see* 15 U.S.C. §78u-4(B)(ii)), which motions are scheduled to be heard on October 14, 2011 at 10:00 a.m.;

WHEREAS, the parties believe that the Related Actions should be consolidated pursuant to Rule 42(a) of the Federal Rules of Civil Procedure because they involve common questions of law and fact; indeed, the Related Actions involve the same parties, events, and claims under the federal securities laws; and

WHEREAS, the parties believe consolidation of the Related Actions would serve the interests of judicial and litigant economy and avoid the potential for conflicting rulings.

THEREFORE, IT IS HEREBY STIPULATED AND AGREED by plaintiffs and defendants, through their respective counsel of record, that the Related Actions should be consolidated as *In re Yahoo! Inc. Securities Litigation*, Master File No. 11-cv-02732-CRB, and all documents should be filed only in Master File No. 11-cv-02732-CRB.

IT IS SO STIPULATED.

DATED: September 30, 2011

ROBBINS GELLER RUDMAN  
& DOWD LLP  
CHRISTOPHER P. SEEFER

s/ Christopher P. Seefer  
CHRISTOPHER P. SEEFER

Post Montgomery Center  
One Montgomery Street, Suite 1800  
San Francisco, CA 94104  
Telephone: 415/288-4545  
415/288-4534 (fax)

ROBBINS GELLER RUDMAN  
& DOWD LLP  
DARREN J. ROBBINS  
DANIELLE S. MYERS  
655 West Broadway, Suite 1900  
San Diego, CA 92101  
Telephone: 619/231-1058  
619/231-7423 (fax)

Attorneys for Plaintiffs Vince Bonato and  
Twin City Pipe Trades Pension Trust

DATED: September 30, 2011

MORRISON & FOERSTER LLP  
JORDAN ETH  
ANNA ERICKSON WHITE  
MARK R.S. FOSTER

s/ Mark R.S. Foster  
MARK R.S. FOSTER

425 Market Street  
San Francisco, California 94105-2482  
Telephone: 415/268-7000  
415/268-7522 (fax)

Attorneys for Defendants

I, Christopher P. Seefer, am the ECF User whose ID and password are being used to file this  
Stipulation and [Proposed] Order Regarding Administrative Motion to Relate Cases. In compliance  
with General Order 45, X.B., I hereby attest that Mark R.S. Foster has concurred in this filing.

s/ Christopher P. Seefer  
CHRISTOPHER P. SEEFER

\* \* \*

**ORDER**

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: October 4, 2011

THE HONORABLE  
UNITED STATES

